



U.S. Department of Justice
United States Attorney
District of New Jersey

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Via Email and ECF

Honorable Noel L. Hillman, U.S.D.J.
Mitchell H. Cohen Building & U.S. Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

Re: United States v. Nicholas Bucciarelli
Crim. Nos. 21-506 & 21-507

Dear Judge Hillman:

The Government respectfully submits this letter in support of a joint request to adjourn the status conference currently scheduled for Monday, September 20, 2021 at 1:00 p.m. At Mr. Bucciarelli's arraignment on July 19, 2021, the Government represented that it anticipated producing discovery by the end of August. The Government has been producing Rule 16 discovery on a rolling basis, but has experienced some unexpected delays stemming from technical complications with certain media files, as well as delays in receiving responsive documents from the New Jersey Superior Court. The Government anticipates producing the remainder of the responsive materials currently in its possession by tomorrow, September 17.

In order to afford counsel an adequate opportunity to review the discovery in advance of the status conference, the parties jointly request a three-week adjournment of Monday's appearance. Thank you for your consideration.

Very truly yours,

RACHAEL A. HONIG
Acting United States Attorney

A handwritten signature in cursive script, appearing to read "Robert Frazer".

By: _____

Robert Frazer
Samantha C. Fasanello
Assistant U.S. Attorneys

Cc: Robert N. Agre, Esq. (via E-mail and ECF)